

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
IN RE:)	
RICHARD A. WOROB)	Chapter 13
Debtor,)	Case No. 22-10061
_____)	

DEBTORS RESPONSE TO THE OBJECTION TO CONFIRMATION OF PLAN

Now comes the Debtor, Richard A. Worob, through counsel and hereby responds to the Objection to Confirmation of Plan as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. No response required.
9. Admitted.
10. Admitted. Debtor shall amend Schedule J to show taxes and insurance.
11. Admitted.
12. The Debtor states that the tenants cover the utility bills.
13. The Debtor states that he will add a maintenance expense to Schedule J.
14. Denied.
15. Denied.

16. Admitted.
17. Admitted.
18. Admitted, however the Debtor is not opposed to increasing the rent.
19. Admitted, however the Debtor is not opposed to increasing the rent.
20. Admitted.
21. Admitted, however the Debtor will increase the rent to show affordability with appropriate notice to the tenants.
22. Denied.
23. Denied.
24. Denied.
25. The Debtor would like the opportunity for a third party appraiser to assess the property.
26. Admitted.
27. Admitted.
28. Admitted as the movant is the first mortgage holder.
29. Admitted.

WHEREFORE, the Debtor, Richard A. Worob, hereby requests that the Objection to Confirmation of Plan be withdrawn or denied by this Honorable Court.

Respectfully Submitted,
The Debtor,
By Their Attorney,

/s/ Peter M. Daigle
Peter M. Daigle, Esquire
1550 Falmouth Road, Suite 10
Centerville, MA 02632
(508) 771-7444

Dated: July 20, 2022

CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused a duplicate copy of the above to be served upon all parties of record via electronic mail and first class mail.

/s/ Peter M. Daigle
Peter M. Daigle, Esquire
1550 Falmouth Road, Suite 10
Centerville, MA 02632
(508) 771-7444

Dated: July 20, 2022

Electronic Mail:

Carolyn Bankowski, US Trustee
John Fitzgerald, Asst. US Trustee
Jason J. Giguere, Esq., Counsel for DLJ Mortgage Capital, Inc.
DLJ Mortgage Capital, Inc.